

**Chevron**SITE: Chevron ortho
BREAK: 3.1
OTHER: V16

January 10, 1994

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Ms. Dorothy L. Rayfield
Site Assessment
EPA Region IV
Waste Management Division
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Chemical

Environment & Health Protection
6001 Bollinger Canyon Road
San Ramon, CA 94583

Chevron Orlando Site RI/FS SACM

Dear Ms. Rayfield:

The purpose of this letter is to present our proposed approach to the treatment and disposal of the drums of purge and development water, and the drums of drill cuttings on the subject site. As with investigation derived wastes from most Superfund sites, we are having a hard time getting the waste disposal contractors to take drummed purge water. Accordingly, we are proposing to treat the drummed purge water and to discharge the treated water on-site.

We estimate that we have 5,000 to 6,000 gallons of water on-site, including approximately 2,700 gallons in a steel mud (frac) tank from the pumping test, and another 2,500 to 3,000 gallons in 55 gallon drums from the well purging and development. Using the analytical results from the monitor well sampling, and analytical results from a sample of the water in the frac tank, we have determined that the contaminants in the water can be treated with granular activated carbon (GAC). GAC was used to treat waste water generated during the Removal Action and the treated water was discharged on-site.

We are proposing to pump the drums of purge water into the frac tank. The water in the frac tank will then be pumped at a rate of approximately 5-gallons per minute through two, 55-gallon drums of GAC. The treated water will be discharged into a second frac tank. When the treatment process is complete, the effluent that is stored in the second frac tank will be sampled and samples analyzed for purgeable halocarbons and purgeable aromatics by EPA Methods 8010 and 8020, and for chlorinated pesticides by EPA Method 8080.

Following treatment and confirmation of contaminant removal, the treated water will be discharged on the site by spray irrigation. Special care will be taken to control the spray of treated water so that all of the water will remain on the site, and so that mists from the spray operation will not travel off-site.

All treatment and discharge operations will be conducted by TASK representatives. The treated water discharge criteria are the maximum contaminant levels (MCLs) defined by the Florida Administrative Code Chapter 17-550, or Federal MCLs if lower.

The treatment process can be completed within four, 8-hour days. The laboratory analysis will be rushed, to provide analytical results within two-days of sample collection. The irrigation process can also be accomplished within four days, depending on the weather conditions. Irrigation activities may be extended if excessive rainfall occurs.



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The drums of drill cuttings (soil and solids from the drilling mud) will be removed from the drums and temporarily stockpiled on-site, on a visqueen-lined area. The cuttings will be covered with visqueen to minimize transport by stormwater. The drill cuttings will be shipped off-site with the soil excavated from the trailer park for disposal at Waste Management, Inc.'s Springhill Landfill. The material will be disposed of as industrial waste.

Please contact me if you have any questions regarding the approach for disposal of the drummed materials, and let me know at your earliest convenience when we might proceed with the water treatment activities.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff D. Wyatt", with a stylized, sweeping flourish extending from the end of the name.

Jeff D. Wyatt
Senior Environmental Projects Engineer

JDW:mal

cc: Susan Klinzing Tobin, TASK
Houston Kempton, PTI